

July 1, 2019

Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Amadei, et al., v. McAleenan, et al.*, No. 17 Civ. 5967

Dear Judge Scanlon:



National Office
125 Broad Street, 18th floor
New York NY 10004
(212) 549-2500
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We represent Plaintiffs in the above-referenced matter and write jointly on behalf of the parties to seek a one-week extension of the deadline in the Court's June 19, 2019 Order (ECF No. 117). The parties also seek clarification of that Order.

The Court's June 19 Order set a deadline of July 3, 2019 for the parties to file their stipulation of dismissal. The parties respectfully request a one-week extension of this deadline, until July 10, 2019, to allow additional time to finalize the settlement stipulation and to obtain final client consent. This is the parties' first request for an extension of this deadline, and it does not affect any other deadlines.

In addition, the parties seek clarification of the June 19 Order, which requires the parties to file their stipulation of dismissal. The parties have agreed not to dismiss the case pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) until after Defendants take actions pursuant to the settlement agreement. Because of this requirement, and with the Court's consent, the parties instead propose to finalize the agreement and file a joint letter informing the Court of the final settlement on or before July 10, 2019. The parties will then file the executed stipulation and dismissal upon completion of the actions set forth in the agreement. The parties anticipate filing the stipulation and dismissal by September 9, 2019.

Respectfully submitted,

s/ Anna Diakun
Anna Diakun

Counsel for Plaintiffs

cc: All counsel (by ECF)